

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

MEMPHIS A. PHILLIP RANDOLPH
INSTITUTE, et al.,

Plaintiffs,

v.

TRE HARGETT, et al.,

Defendants.

Civil No. 3:20-cv-0374

JUDGE RICHARDSON
MAGISTRATE JUDGE FRENSELY

**DECLARATION OF JEFFREY LICHTENSTEIN IN SUPPORT OF PLAINTIFFS'
RESPONSE TO DEFENDANTS' EMERGENCY MOTION FOR A STAY PENDING
APPEAL
(Pursuant to 28 U.S.C. § 1746)**

I, Jeffrey Lichtenstein, am over the age of 18 and fully competent to make the following declaration. The facts in this declaration are based on my personal knowledge. If called upon as a witness, I would testify to these facts. Under penalty of perjury, I declare and state the following:

Personal Background

1. I am the Executive Secretary of the Memphis and West Tennessee AFL-CIO Central Labor Council (“MCLC”). I have served in this capacity since January 2018. I personally have a strong passion for labor rights and voting rights work. As an organizer, I believe it is my duty to engage the community I work with and live in and encourage them to vote.

2. MCLC has spoken with at least 500 voters since the Court’s September 9, 2020 Order granting Plaintiffs’ Motion for Preliminary Injunction with respect to the first-time voter restriction. It would be essentially impossible to recontact each of these voters and inform them that the Court’s order has been stayed. Thus, a stay would cause significant confusion among our

members and the communities we engage.

3. MCLC has incorporated the court's September 9 Order into all of its meeting announcements about absentee voting, including announcements made at volunteer events and union meetings.

4. During the phone banking campaigns MCLC has conducted since the court's September 9 Order, we have directed our volunteers to inform voters who are eligible to and wish to vote absentee of their right to vote absentee, even if it is their first time voting in the state or their county.

5. MCLC volunteers have spoken with at least 500 voters since the court's September 9 order, including some who indicate that they intend to or may vote by mail. Each of these voters were informed of their right to vote absentee even if it will be their first time voting in the state or their county.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed this 7th day of October, 2020.



Jeffrey Lichtenstein